

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	CASE NO. 20-41227
ROYAL TRANSPORT EXPRESS, LLC,	§	
	§	
	§	CHAPTER 11
Debtor.	§	

STIPULATION

The Debtor and City of Wylie, subject to the approval of the United States Bankruptcy Court, stipulate as follows:

A. On May 26, 2020, the Debtor filed a voluntary petition for relief pursuant to chapter 11 of title 11 of the United States Code.

B. The City of Wylie asserts that it holds unavoidable, perfected, first priority liens against the Debtor's business personal property. The Debtor's business personal property includes but is not limited to, all of the Debtor's furniture, fixtures, machinery, equipment, inventory and other tangible business personal property pursuant to sections 32.01 and 32.05 of the Texas Tax Code and 11 U.S.C. Section 362(b)(18). These liens secure ad valorem business personal property taxes.

C. The Debtor and the City of Wylie have entered into this stipulation in order to provide the city with relief from the automatic stay commensurate with the relief that has been granted to or will be granted to any other secured creditor who holds a lien against or security interest in collateral to which the City of Wylie's liens attach.

D. The parties stipulate that:

a. in the event the automatic stay and other stays, restraints or injunctions existing by operation of law or otherwise restricting repossession or

foreclosure have been removed or are removed as to any secured creditor with a lien against or security interest in certain collateral to which the city's liens attach, the City of Wylie shall receive the same relief as to such specific collateral;

b. nothing in this stipulation shall prevent the city from seeking additional adequate protection and/or relief from this Court while the case is pending, and nothing in this stipulation shall prevent the Debtor from responding thereto.

STIPULATED AND AGREED:

/s/ Laurie A. Spindler
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